

As one of the nation's Amateur Radio Operators and an FCC licensee in good standing for many years, I am opposed to any further relaxing of restrictions on Part 15 operations of BPL or PLC. Further, I am concerned that the FCC has taken a role to promote BPL/PLC through its own rulemaking process. These petitions, it seems to me, should come directly from the industries that stand to gain, not the FCC who should be an impartial arbiter in and act in defense of the fair and equitable use of spectrum.

Amateur Radio, as the FCC clearly understands, provides a sizeable group of highly trained communications specialists. Amateur Radio Operators routinely provide primary communications services in disaster situations. Given our national events over the past few years, they are recognized as a vital resource in the national communications infrastructure. I serve as the manager for the Eastern Massachusetts/Rhode Island communications net, a component of the American Radio Relay League's National Traffic System (NTS). Operations of NTS are routinely conducted on HF frequencies. These frequencies, low HF through 80 MHz (depending on the PLC system employed) would be severely impacted.

There are numerous studies that have already been conducted in many countries which have determined PLC offers harmful interference to other services. To remove the current Part 15 restrictions on PLC to "facilitate the deployment of this technology" would be a great disservice to the Amateur Service.

I strongly recommend the Commission review the studies that have been conducted in Japan, for example, the conclusion being that PLC was not a desirable option due to the harmful interference it generates. A good reference to these studies is available here:

http://www.arrl.org/tis/info/HTML/plc/#Amateur_Interference_Studies

I therefore ask the Commission to forgo any further study of this technology based on the following:

- 1) PLC has been proven to cause harmful interference in plenty of studies already in various locations around the world;
- 2) PLC deployment will seriously degrade licensed HF and, depending on the method, VHF services in both the Amateur and Commercial bands;
- 3) Further relaxing restrictions on Part 15 operation of PLC would increase the potential for widespread interference;
- 4) Part 15 is intended to be applied to a single device, such as a radio set, baby monitor, etc. PLC represents a considerably large radiator covering entire communities, not a single point source;
- 5) The promotion of PLC should not be undertaken by the FCC, but proposed by industries or individuals interested in its development.

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